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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

HOWARD GROBSTEIN, as Chapter 7)	Case No. 3:18-cv-01916-YY
Bankruptcy Trustee for, BLANCA)	
AGUIRRE,)	
Plaintiff,)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO SUBMIT
)	PROPOSED PRETRIAL ORDER
v.)	
)	
PORT OF PORTLAND, a Municipal)	
Corporation, THOMAS T. KO, an)	
individual, JEREMY HEPP, an individual,)	
JACOB CASSITY, an individual, JERRY)	
SALDIVAR, an individual, POLLIN)	
HOTELS II, LLC, an Oregon limited)	
liability company, doing business as)	
SHERATON PORTLAND AIRPORT)	
HOTEL, STARWOOD HOTELS &)	
RESORTS WORLDWIDE, LLC, a)	
foreign limited liability company doing)	
business as and CANTERBURY HOTEL)	
GROUP, an Oregon company, doing)	
business as FOUR POINTS BY)	
SHERATON PORTLAND EAST,)	
Defendants.)	
)	

CERTIFICATE OF CONFERRAL

Pursuant to LR 7.1, counsel for the Plaintiff hereby certifies that he has conferred with Port Defendants' counsel, Beth Plass, and Defendant Pollin Hotels II, LLC's counsel, Sean Conner. Counsel for Defendants do not object to this motion.

The Plaintiff, by and through her attorney, Christopher M. Edison, respectfully requests an extension until October 1, 2021 to finalize the proposed pretrial order. The parties were unable to finalize the pre-trial order by the current deadline of September 24, 2021, due to the workload and schedules of the parties.

This request is made pursuant to the provisions of Fed. R. Civ. Pro. 6(b). It is brought in good faith, and Plaintiff's Motion to Extend Discovery Deadlines.

DATED this 23rd day of September, 2021.

s/Christopher M. Edison

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Attorneys for Plaintiff Howard Grobstein, as Chapter

7 Bankruptcy Trustee for Blanca Aguirre

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

HOWARD GROBSTEIN, as Chapter 7
Bankruptcy Trustee for, **BLANCA
AGUIRRE**,

Plaintiff,

v.

PORT OF PORTLAND, a Municipal
Corporation, **THOMAS T. KO**, an individual,
JEREMY HEPP, an individual, **JACOB
CASSITY**, an individual, **JERRY
SALDIVAR**, an individual, **POLLIN
HOTELS II, LLC**, an Oregon limited liability
company, doing business as **SHERATON
PORTLAND AIRPORT HOTEL**,
**STARWOOD HOTELS & RESORTS
WORLDWIDE, LLC**, a foreign limited
liability company doing business as and
CANTERBURY HOTEL GROUP, an
Oregon company, doing business as **FOUR
POINTS BY SHERATON PORTLAND
EAST**,
Defendants.

Case No. 3:18-cv-01916-YY

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT PROPOSED PRETRIAL ORDER** on the counsel of the parties herein by electronic and regular mail on September 23, 2021.

DATED this 23rd day of September 2021.

s/ Christopher M. Edison
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